

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

JOHANNA NEGRON ADAMES ET AL
Plaintiffs

vs.

DORADO HEALTH INC. et als.
Defendants

CIVIL NO. 21-1077(WGY)

MOTION REQUESTING ORDERS

TO THE HONORABLE COURT:

COME NOW plaintiffs, through their undersigned counsel, and very respectfully hereby state and pray as follows:

1. On April 14, 2021, Plaintiffs filed a “Second Motion Requesting Order” at Docket 21 in order to have the “Oficina de Reglamentación y Certificación de los Profesionales de Salud Junta de Licenciamiento y Disciplina Médica Departamento de Salud del Estado Libre Asociado de Puerto Rico”, produce a copy of co-defendant Dr. Francisco Dubocq’s file at said institution. A proposed order was submitted as an exhibit of said motion at Docket No. 21.

2. On April 22, 2021, Plaintiffs request was granted by this Honorable Court per Docket No. 28. However, the proposed order, which was an exhibit of the motion at Docket No. 21, was never signed and provided to Plaintiffs. Hence, Plaintiffs have not been able to request or receive a copy of co-defendant Dr. Francisco Dubocq’s records at “Oficina de Reglamentación y Certificación de los Profesionales de Salud Junta de Licenciamiento y Disciplina Médica Departamento de Salud del Estado Libre Asociado de Puerto Rico”.

3. In light of the above stated, Plaintiffs respectfully request from this Honorable Court that said proposed order be signed and entered in order to conduct said discovery as swiftly as possible.

4. Also, on April 14, 2021, at Docket 22, Plaintiffs filed a “Second Motion Requesting Order” for the files of co-defendant Dr. Francisco Dubocq’s at “Colegio de Médicos Cirujanos de Puerto Rico”. A proposed order was also included as an exhibit of said motion at Docket No. 22. As of this date, said motion at Docket No. 22 remains unopposed and has not been granted by this Honorable Court. Therefore, Plaintiff’s request that said order at Docket No. 22 be granted.

5. Plaintiffs are enclosing the proposed orders to the instant motion.

WHEREFORE, Plaintiffs respectfully that the proposed order for the records at “Oficina de Reglamentación y Certificación de los Profesionales de Salud Junta de Licenciamiento y Disciplina Médica Departamento de Salud del Estado Libre Asociado de Puerto Rico” at Docket No. 22 be signed and entered and that order at Docket No. 22 to obtain the records of Dr. Dubocq at “Colegio Medico Cirujano de Puerto Rico be granted and the proposed order be signed and enter as well.

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of September, 2021.

S/Pedro F. Soler Muñiz
PEDRO F. SOLER-MUÑIZ
USDC-PR NO. 212,909
Counsel for Plaintiffs
Pedro F Soler Muñiz
1225 Ave. Ponce de Leon
Edif. VIG Tower, Suite BS-D
San Juan, PR 00907
Tel. 787-774-6522; Fax. 787-706-8680
psoler@pedrosolerlaw.com

S/Alejandra C. Martínez Méndez
ALEJANDRA C. MARTINEZ MENDEZ
USDC/PR NO. 303111
Counsel for Plaintiffs
Pedro F. Soler Muñiz
1225 Ave. Ponce de Leon
Edif. VIG Tower, Suite BS-D
San Juan, PR 00907
Tel. 787-774-6522; Fax 787-706-8680
amartinez@pedrosolerlaw.com

S/Alejandro J. Fernandez Muzaurieta
ALEJANDRO J. FERNANDEZ
MUZAURIETA
USDC-PR 223706
Counsel for Plaintiff
Alejandro J. Fernandez Muzaurieta
PO BOX 16264
San Juan, PR 00908
Tel. 939-337-4740
alejandrofernandezz@yahoo.com